Bruce W. Radowitz, Esq 636 Chestnut Street Union, New Jersey 07083 (908) 687-2333 BRUCE W. RADOWITZ, ESQ. Attorney for Debtor(s)

In the matter of

ANTE MARKOTA

Debtor

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Case No: 15-15565/CMG

CHAPTER 7

NOTICE OF MOTION FOR AN ORDER REOPENING CASE TO FILE THE FINANCIAL MANAGEMENT CERTIFICATE

DEAR COUNSEL:

PLEASE TAKE NOTICE that on or as soon thereafter as counsel may be heard, the undersigned, attorneys for the Debtor herein, shall move before the Honorable Christine M. Gravelle, United States Bankruptcy Judge, United States Bankruptcy Court, for the District of New Jersey, Martin Luther King Jr., 50 Walnut Street, Newark New Jersey for an Order Reopening Case to file the Financial Management Certificate.

PLEASE TAKE FURTHER NOTICE that the undersigned relies upon the within application and order.

PLEASE TAKE FURTHER NOTICE that the within matter does not involve any complex issues of law and therefore no brief is necessary.

Respectfully submitted,		Bruce W. Radowtiz, Esq
		Attorneys for the Debtors
Dated:	by:	/s/ Bruce W. Radowitz
Daleu.	by	BRUCE W RADOWITZ ESO